

UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS

UNITED STATES OF AMERICA)	
)	
v.)	CRIMINAL NO. 17-cr-10300-LTS
)	
CURTIS SIMONEAU)	

MOTION TO FILE DEFENDANT'S SENTENCING MEMORANDUM UNDER SEAL

The Defendant, Curtis Simoneau, hereby moves that this Court grant him leave to file his sentencing memorandum and related exhibits under seal. As grounds for this motion, undersigned counsel state that the memorandum will address in detail Mr. Simoneau's medical history, mental health history, and other matters of a sensitive nature and should not be available on the public record.

Respectfully submitted,
CURTIS SIMONEAU
by his attorney
/s/ Scott Lauer
Scott Lauer (BBO #667807)
FEDERAL PUBLIC DEFENDER OFFICE
51 Sleeper Street, 5th Floor
Boston, MA 02210
617-223-8061 (phone)
617-223-8080 (fax)

Certificate of Service

I, Scott Lauer, hereby certify that copies of this motion were submitted via electronic mail to Assistant United States Attorney David Tobin and U.S. Probation Officer Maria D'Addieco.

Date: September 28, 2017

/s/ Scott Lauer

Scott Lauer